

**THE ROSEN LAW FIRM, P.A.**  
Laurence M. Rosen, Esq.  
Phillip Kim (*pro hac vice*)  
609 W. South Orange Avenue, Suite 2P  
South Orange, NJ 07079  
Telephone: (973) 313-1887  
Fax: (973) 833-0399  
[lrosen@rosenlegal.com](mailto:lrosen@rosenlegal.com)  
[pkim@rosenlegal.com](mailto:pkim@rosenlegal.com)

*Counsel for Lead Plaintiffs  
and the Class*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

---

RODNEY OMANOFF AND NEIL VANLEEUWEN, INDIVIDUALLY AND ON BEHALF OF ALL OTHERS SIMILARLY SITUATED,

Plaintiffs,

vs.

PATRIZIO & ZHAO LLC; P&K CPAs LLC; XINGGENG (JOHN) ZHAO; AND JOHN G. PATRIZIO,

Defendants.

Case No.: 14-cv-00723-MCA-LDW

---

**NOTICE OF MOTION FOR FINAL APPROVAL OF SETTLEMENT AND  
PLAN OF ALLOCATION**

PLEASE TAKE NOTICE that on January 25, 2016 at 11:00 a.m., Lead Plaintiffs Neil Vanleeuwen and Rodney Omanoff shall move before the Honorable Madeline Cox Arleo, U.S.D.J., at the Martin Luther King, Jr. Federal Building and U.S. Courthouse, 50 Walnut Street, Newark, New Jersey, for Final Approval of Settlement and Plan of Allocation.

PLEASE TAKE NOTICE that in support of their motion, Lead Plaintiffs will rely upon the supporting Memorandum of Law and declarations, well as all prior proceedings held in this action, and other such matters and arguments as the Court may consider in the hearing of this Motion.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Federal Rules of Civil Procedure, a proposed Order is attached to the Motion.

Dated: December 21, 2015

Respectfully submitted,

**THE ROSEN LAW FIRM, P.A.**

/s/ Laurence M. Rosen

Laurence M. Rosen, Esq.  
Phillip Kim, Esq. (*pro hac vice*)  
609 W. South Orange Avenue, Suite 2P  
South Orange, NJ 07079  
Telephone: (973) 313-1887  
Fax: (973) 833-0399  
lrosen@rosenlegal.com  
pkim@rosenlegal.com

*Counsel for Lead Plaintiffs and the  
Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on this on the 21st day of December, 2015, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/*Laurence M. Rosen*